

August 17, 2021

Hon. Kimba M. Wood United States District Court for the Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Gordon Freedman

Case No.: 18 Cr. 217 & 19 Cr. 249 (KMW)

Dear Judge Wood,

MEMO ENDORSED

I represent Gordon Freedman who is scheduled to surrender to the Bureau of Prisons by 2:00 pm on September 8. For the reasons stated herein, I respectfully request a modification of Mr. Freedman's bail conditions so that he may travel to Louisiana and remain there until he is scheduled to surrender to the Bureau of Prisons.

At our request, this Court recommended that Mr. Freedman be housed at FCI Oakdale in Louisiana. In anticipation of his surrender, Mr. Freedman requests that he be permitted to spend his last month of freedom in Louisiana and reside at an address previously provided to Pre-Trial. In that way, should the BOP designate him to FCI Oakdale, he may walk-in and surrender directly to the facility. If he is not designated to FCI Oakdale, Mr. Freedman would still surrender to the US Marshals in Louisiana by his surrender date. Please note that Mr. Freedman's lease for his apartment in New York ends on September 1 and it may not be extended because his building has been sold.

Should this request be approved, all other conditions of Mr. Freedman's release would remain the same.

The Government and Pre-Trial Services have no objection to this request.

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Thank you for your attention in this matter. Should you require any additional information, please do not hesitate to contact me.

Respectfully submitted,

s/Sam Braverman
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Cc: AUSA (via ECF)

8/18/21

SO ORDERED, N.Y., N.Y.

KIMBA M. WOOD U.S.D.J.